

## **APPENDIX C**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

PAUL COX, individually and on behalf )  
of the classes defined herein, )  
Plaintiff, )  
v. ) No. 08 C 1005  
UNIFUND CCR PARTNERS; )  
CREDIT CARD RECEIVABLES )  
FUND, INC., and )  
ZB LIMITED PARTNERSHIP, )  
Defendants. )

**DEFENDANT UNIFUND'S SUPPLEMENTAL ANSWERS TO CERTAIN  
REQUESTS FOR ADMISSION**

Defendant Unifund CCR Partners (hereinafter referred to as "Unifund") hereby submits its supplemental answers to certain requests for admissions as follows:

26. There are at least 40 (a) natural persons (b) with respect to whom defendant Unifund CCR Partners filed a lawsuit (c) attaching a document in the form represented by Appendix A (d) which document was not sent to the addressee prior to the filing of the suit (e) where the lawsuit was filed or served during a period beginning on February 19, 2007 (a date one year prior to the filing of this action) and ending March 10, 2008 (a date 20 days after the filing of this action).

**ANSWER:** Based upon further investigation with collection counsel, Unifund admits that (a), (b), (c), (d) and (e) are true; however, Unifund's usual practice for Illinois between February 19, 2007 and March 10, 2008 was for Unifund and/or its collection counsel to send the debtor at least one letter prior to the filing of the collection suit which sets forth such information as the debtor's account number, balance due, and the name of the original creditor.

27. There are at least 100 (a) natural persons (b) with respect to whom defendant Unifund CCR Partners filed a lawsuit (c) attaching a document in the form represented by Appendix A (d) which document was not sent to the addressee prior to the filing of the suit (e) where the lawsuit was filed or served during a period beginning on February 19, 2007 (a date one year prior to the filing of this action) and ending March 10, 2008 (a date 20 days after the filing of this action).

**ANSWER:** Based upon further investigation with collection counsel, Unifund admits that (a), (b), (c), (d) and (e) are true; however, Unifund's usual practice for Illinois between February 19, 2007 and March 10, 2008 was for Unifund and/or its collection counsel to send the debtor at least one letter prior to the filing of the collection suit which sets forth such information as the debtor's account number, balance due, and the name of the original creditor.

**Swanson, Martin, & Bell, LLP**

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**CERTIFICATE OF SERVICE**

I, Kathleen A. Kelley, certify that I served this document (Defendants' Answers to Plaintiff's Requests for Admission) upon the following:

Daniel A. Edelman  
Tiffany Hardy  
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC  
120 S. LaSalle St., 18<sup>th</sup> Floor  
Chicago, Illinois 60603  
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via email and facsimile from the offices of Swanson, Martin & Bell, LLP, 330 N. Wabash, Suite 3300, Chicago, IL 60611, before 1 pm on this 8<sup>th</sup> day of August, 2008.

Kathleen Kelley

[x] Under penalties as provided by law, I certify that the statements set forth herein are true and correct.